IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application	
Inventors:	James Owen *et al.*
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Title:	FEDERATED MANAGEMENT OF CONTENT REPOSITORIES

PATENT APPLICATION

Art Unit:	2136
Examiner:	P. Parthasarathy

Customer No. 23910

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Laura Hulac (Signature)
Laura Hulac
Signature Date: July 15, 2005

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Mail Stop AF
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

This Request is made in reply to the Advisory Action dated July 6, 2005 and is submitted concurrently with a Notice of Appeal.

I. ISSUE

The Examiner rejected claims 1-59 under 35 USC §102(e) as being anticipated by U.S. Publication No. 2004/0024812 ("Park"). To anticipate a claim, every element of the claim must be disclosed within a single reference. Applicants respectfully submit that Park fails in this regard.

I. SUMMARY OF THE INVENTION

Figure 1 of the present Application is an illustration of a virtual content management framework for integrating a plurality of content repositories into a single, virtual repository in an embodiment. A virtual or federated content repository (hereinafter referred to as "VCR") **100** is a logical representation of one or more individual content repositories **108** such that they appear and behave as a single content repository from an application program's **110** standpoint. In one embodiment, this is accomplished in part by use of an API (application program interface) **104** and an SPI (service provider interface) **102**.

The API **104** presents a unified view of all repositories **108** to application programs **110** and enables them to navigate content, perform create, read, update, and delete operations, and search across multiple content repositories as though they were a single repository. Content repositories **108** that implement the SPI **102** can be integrated into the VCR **100**. In one embodiment, the SPI **102** includes a set of interfaces and/or services that repositories **108** can implement and extend including but not limited to operations supported by the API **104**.

In one embodiment, the API **104** and SPI **102** share a content model **106** that represents the combined content of all repositories **108** as a hierarchical namespace of nodes. At the top of the hierarchy is a federated root. Beneath the root are content repositories **108**. Likewise, each content repository can have child nodes representing the content of that repository. Nodes can represent hierarchy information or content similar. This is analogous to directories and files in a file system. In this way, all of the content of all of the repositories **108** is integrated into a single hierarchical namespace.

II. OVERVIEW OF THE CITED ART

Park discloses a system for integrating and processing multimedia **content** – *not* **content repositories**. Park, ¶11. In contrast, embodiments of Applicants' invention integrate a plurality of content repositories such that they behave as a single, virtual content repository. Merely integrating **content** does not teach or suggest integrating **content repositories** into a virtual content repository.

This fundamental difference between Park and the present Application is further borne out with reference to Figure 1 in Park. Note that Park only discloses a **single repository 8**. According to Park, "the service operating function includes publishing content stored in the repository **8** in real time at a users [sic] request." Park, ¶31. In addition, "[t]he service publication server **4** can be provided with data from data sources such as a relational database system **15a**, a file system **15b**, a web site **15c** on the Internet, an e-mail server **15d**, and an application program **15e** providing result data in XML." Id. Merely obtaining data from various sources does not teach or suggest integrating **content repositories** into a virtual content repository.

A closer examination of repository **8** and service publication server **4** in Figure 5 reveals a lack of any facility for integrating a plurality of content repositories. First, there is no apparent mechanism that would allow repositories to integrate themselves into a virtual content repository, such as a service provider interface (SPI). The repository management tool **7** is "for integrally managing **content** which will be used for publication" – it is not for managing **content repositories**. Park, ¶28 (emphasis added). Again, this underscores the fundamental difference between Park and the present Application.

Second, Park does not disclose a virtual content repository wherein a plurality of content repositories combine efforts to act as a single content repository. Park only discloses a single repository **8** that contains a single content repository **70** which in turn contains virtual web pages called "containers" **74**. Park, ¶41. This is further evidenced by the fact that Park does not disclose a namespace that encompasses all of the information in a plurality of repositories. Instead, Park teaches that "containers **74** are stored in a directory **72** having a hierarchical structure, and the directory **72** may include one or more sub-directories." Park, ¶41. Merely storing virtual web pages in a hierarchical directory does not teach or suggest a namespace encompassing a plurality of content repositories.

Finally, Park does not disclose a content model that includes content from a plurality of repositories. A container in Park is converted into a container document object model (DOM) **55**. Park, ¶59. However, merely converting a container into a DOM **55** does not teach or suggest a content model that includes content from each of a plurality of repositories. If anything, the DOM only includes content from a **single virtual web page** which is represented by the container.

III. ARGUMENT

B. Claims 1 – 10

Claim 1 recites in part, integrating into the VCR each one of said plurality of content repositories whose authorization information indicates successful authorization; wherein each one of said plurality of content repositories exposes a first set of services to enable its integration into the VCR.

As discussed above in *Section A*, Park discloses integration of content – not repositories – in the form of virtual web pages. The relied upon portions of Park disclose a content request API **53** exposed by the service publication server **4** which accepts a request for a container **72** from a web server **62**. Park, ¶58 and Figure 5. "Thereafter, the container transformation module **54** transforms the document in the XML format ... and transmits the transformed content (for example, HTML, HDML, or WML) to the web server **62** for the delivery to the device through the content request API 53." Park, ¶60. Assuming for argument's sake (but not conceding such) that the service publication server 4 is a content repository, the API **53** does not expose functionality for integrating the service publication server 4 into a virtual content repository.

For at least these reasons, claim 1 is not anticipated by Park. Claims 2 – 10 depend from claim 1. It follows that the dependent claims are not anticipated by Park for at least the same reasons.

C. Claims 11 – 20

Independent claim 11 recites in part, incorporating each one of said plurality of content repositories into a hierarchical namespace and wherein each one of said plurality of content repositories exposes a first set of services to enable its integration into the VCR.

As argued above, Park does not disclose these features of Applicants' claim 11.

Claim 11 further recites in part, extending a content model to include content from each one of said plurality of content repositories.

Park discloses the repository content manager **61** loads a container in the memory of the service publication server **4** and converts the container into a container document object model (DOM) object **55**. Park, ¶59. Thereafter, the content transformation module **54** is provided with a document in an XML format from the container DOM object **55**. Id. Assuming for argument's sake (but not conceding such) that the DOM object is a content model, Park does not disclose extending it to include content from a plurality of content repositories – the DOM object represents a single container from a single repository.

Claim 11 further recites in part, incorporating each one of said plurality of content repositories into a hierarchical namespace.

As discussed above in *Section A*, containers can be "stored in a directory **72** having a hierarchical structure, and the directory **72** may include one or more sub-directories." Park, ¶41 and Figure 5. Assuming for argument's sake (but not conceding such) that a directory is a namespace, Park discloses that containers – not repositories – are stored in the directory **72**.

For at least these reasons, claim 11 is not anticipated by Park. Claims 12 – 20 depend from claim 11. It follows that the dependent claims are not anticipated by Park for at least the same reasons.

D. Claims 21 – 29

Independent claim 21 recites in part, a namespace is hierarchical and spans said plurality of content repositories; and wherein each one of said plurality of content repositories exposes a set of services to enable its integration into a virtual content repository (VCR).

In contrast to Applicants' claim 21, Park discloses that a containers within a single repository **8** can be stored in a hierarchical directory structure. See *Section A* above. The directory structure in Park does not span a plurality of repositories.

Claim 21 also recites in part, wherein each one of said plurality of content repositories exposes a set of services to enable its integration into a virtual content repository (VCR). As argued above, Park does not disclose this feature.

For at least these reasons, claim 21 is not anticipated by Park. Claims 21 – 29 depend from claim 21. It follows that the dependent claims are not anticipated by Park for at least the same reasons.

E. Claims 30 – 39, 40-49 and 50-59

Independent claims 30, 40 and 50 recite in part, incorporating each one of said plurality of content repositories into a hierarchical namespace; extending a content model to include content from each one of said plurality of content repositories; and each one of said plurality of content repositories exposes a first set of services to enable its integration into the VCR.

As argued above, these features are not anticipated by Park. For at least this reason, claims 30, 40 and 50 are not anticipated by Park. Claims 31 – 39 depend from claim 30. Claims 41-49 depend from claim 40. Claims 51-59 depend from claim 50. It follows that the dependent claims are not anticipated by Park for at least the same reason.

IV. CONCLUSION AND PRAYER FOR RELIEF

Accordingly, Park does not anticipate any of the claims. Applicants respectfully submit that all of the claims are in condition for allowance.

Respectfully submitted,

Date: 7/15/2005

By: _____

Daniel J. Burns
Reg. No. 50,222

FLIESLER MEYER LLP
Four Embarcadero Center, Fourth Floor
San Francisco, California 94111-4156
Telephone: (415) 362-3800
Customer No. 23910